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20 FEB -8 AM 10:57  
CLERK OF U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JL

Reynaldo C. Tagle Plaintiff,

vs.

City of Richmond  
Richmond Co Defendant(s).

CV 08

CASE NO.

0861

EMPLOYMENT DISCRIMINATION  
COMPLAINT

1. Plaintiff resides at:

Address 2828 Point Arena Ct.

City, State & Zip Code Antioch CA 94531

Phone (925) 754-24028

2. Defendant is located at:

Address 1401 Marina Way South

City, State & Zip Code Richmond CA 94801

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred on this Court by 42 U.S.C. Section 2000e-5. Equitable and other relief is sought under 42 U.S.C. Section 2000e-5(g).

4. The acts complained of in this suit concern:

a. ☐ Failure to employ me.

b. ☒ Termination of my employment.

1 c. ☐ Failure to promote me.

2 d. ☐ Other acts as specified below.

3  
4  
5  
6  
7  
8  
9 5. Defendant's conduct is discriminatory with respect to the following:

10 a. ☒ My race or color.

11 b. ☐ My religion.

12 c. ☐ My sex.

13 d. ☒ My national origin.

14 e. ☐ Other as specified below.

15  
16 6. The basic facts surrounding my claim of discrimination are:

17 I was terminated because of what happened  
18 during my off time. I was told that we  
19 "Filipinos" are coming to this country to  
20 take high paying jobs and I should go  
21 back to my country where I came  
22 from. The Director of Public Works with  
23 the city of Richmond told me this.  
24

25 7. The alleged discrimination occurred on or about 5/29/06.

26 (DATE)

27 8. I filed charges with the Federal Equal Employment Opportunity Commission (or the  
28 California Department of Fair Employment and Housing) regarding defendant's alleged

1 discriminatory conduct on or about 5/29/06.

2 (DATE)

3 9. The Equal Employment Opportunity Commission issued a Notice-of-Right-to-Sue letter  
4 (copy attached), which was received by me on or about \_\_\_\_\_.

5 (DATE)

6 10. Plaintiff hereby demands a jury for all claims for which a jury is permitted:

7 Yes ☒ No ☐

8 11. WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate,  
9 including injunctive orders, damages, costs, and attorney fees.

10  
11 DATED: 2/8/08

12   
SIGNATURE OF PLAINTIFF

13  
14 (PLEASE NOTE: NOTARIZATION  
15 IS NOT REQUIRED.)

16 REYNALDO C. TAGLE

17 PLAINTIFF'S NAME

18 (Printed or Typed)

EEOC Form 161 (3/98)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: REYNALDO C. TAGLE  
2828 Point Arena Court  
Antioch, CA 94531

From: San Francisco District Office  
350 The Embarcadero  
Suite 500  
San Francisco, CA 94105



On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

37-JV-2007-08679

Alexis Durbin,  
State & Local Coordinator

(415) 625-8611

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.



Having been given 30 days in which to respond, you failed to provide information, failed to appear or be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve your charge.



While reasonable efforts were made to locate you, we were not able to do so.



You were given 30 days to accept a reasonable settlement offer that affords full relief for the harm you alleged.



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information received establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS** of the date of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state of law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 3 years before you file suit may not be collectible.

On behalf of the Commission



H. Joan Ehrlich,  
District Director

NOV 16 2007

(Date filed)

Enclosures(s)

cc: RICHMOND, CITY OF  
1401 Marina Way South  
Richmond, CA 94801